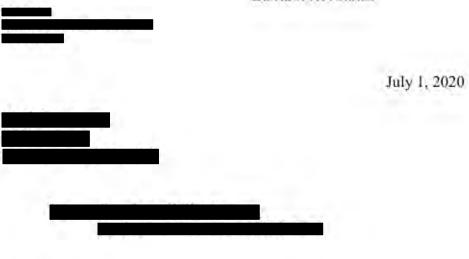


OFFICE OF THE DISTRICT ATTORNEY RICHMOND COUNTY

MICHAEL E. MCMAHON

DISTRICT ATTORNEY



With reference to the above-mentioned case, and pursuant to our continuing obligations, the People make the following disclosures:

The People are aware that during the time he/she has been employed by the New York City Police Department, Daniel Guariano has been named as a defendant or co-defendant in several federal civil lawsuits.

- Martin v. City of New York, et al., 10-CV-1261 settled in 2010 for \$40,000, with stipulation of settlement filed ending litigation in the Eastern District of New York. As part of this settlement, Detective Guariano was held harmless.
- 2. Alston v. City of New York et al., 11-CV-2038 settled in 2014 for an undisclosed amount with stipulation of settlement filed ending litigation in the Eastern District of New York

In the cases that settled, a stipulation of settlement and order of dismissal with prejudice was filed with the respective court, indicating, in sum and substance, that nothing in the settlement shall be construed as an admission or concession of liability by any of the defendants or the City of New York regarding any of the allegations made by the plaintiffs in their complaints, or that any of the plaintiffs' rights under the Federal or New York Constitutions or Statutes had been violated.